

Re: Docket No. 050-15-1
Regulatory Analysis & Development
P.P.D.
APHIS
STATION 3C71
4700 River Road, Unit 118
Riverdale, MD 20737-1238

Dear Sirs:

First let me note that I feel an initial 30-day comment period, although adjusted to 60 days, is a very short comment time. It takes time for producers to learn of these timeframes and to acquire a draft of the strategic plan. Our industry organizations only send out monthly newsletters and then they needed to update the new deadline. Additionally, the everyday pressures and demands on individuals as one attempts to manage their business leaves little time to study the draft and frame a comment letter. However, if APHIS has already determined their course of action without regard to the sheep advisory working group or producer input, then a 30-day comment time frame is understandable.

It also should be noted that the dissemination of information about a national identification for animals is lacking in many small or backyard operations, as these folks may not be members of any sheep group. I get many calls from folks just wanting lambs to clean up the grass around their place, and then those lambs will go in the freezer. Maybe the lambs do not all go in the freezer, but these folks don't care if animals are carrying any ID. We saw evidence of the proliferation of small operations here in California when Exotic Newcastle Disease showed up in chicken flocks large and small in the southern part of the state.

With all that needs to be put in place in the infrastructure, continuing awareness and education, additional research for a reliable tag, definitions of "premise" and "animal movement", etc., I believe the NAIS current timelines are not realistic, certainly not for sheep. Certainly not all species can be ready for entry into the mandatory program until the above concerns are addressed for each. It seems decisions are being made before adequate research is done on many aspects of this program.

I have personal experience with the Scrapie program, having purchased an animal that soon showed the clinical signs of scrapie. As I was already on the Volunteer Scrapie Program, I contacted my State veterinarians who responded to follow through. This was the time of study and testing of the third eyelid test. My flock was the first in California to be tested. I was able to witness firsthand the confusion between agencies, the obvious lack of field experience of almost all of the APHIS and CEAH folks, and consequently their complete lack of understanding of the cycle of production and the consequences of handling ewes during their pregnancies and with absolutely no awareness of the preparation and manpower needed to accomplish this testing.

The Scrapie program has begun to mature. Why can it not be utilized to be the sheep program? It only makes common as well as economic sense to retain this program and simply modified it to stand alongside the programs for other species. It is not necessary to reinvent the wheel. A way must be found for those producers who are unable to tag their animals at home to have an alternative so as to come into compliance. Perhaps it can be done at market point. Also, a simple, easy way must be determined for direct sales to be reported. Actually, I believe it is not now even established who is responsible for identifying animals.

The burden of collecting and maintaining records for NAIS will be costly in both terms of time and manpower required, as well as preparing and delivering required documents. A complete plan of reporting requirements does not seem to exist yet.

It must be demonstrated to producers that the records concerning their flocks, i.e. numbers, location, movement times and cycles must be private and not for public release. The economic security of the producers must be maintained above all. The stated purpose of animal identification is to help trace animals so disease can be eradicated. That means records should be available to track an individual animal back to a source flock, and those records are kept for a number of years by the producer, those who may have handled that animal and the slaughter house or final border crossing of that animal. None of that is public business. Those records are there for the sole purpose of serving as a reference repository should the need arise to trace a specific animal.

With all the paperwork currently required to maintain a business today, it is imperative for USDA to minimize the amount of records necessary for the NAIS. Many more of these burdens, and we just may lose the sheep industry in the U.S. and lots of USDA folks will consequently lose their jobs.

Thank you for your consideration.

Joanne Nissen
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